| 1 2 | RENE L. VALLADARES Federal Public Defender State Bar No. 11479                               |   |  |
|-----|--|---|--|
| 3   | RAQUEL LAZO Assistant Federal Public Defender Nevada State Bar No. 8540                      |   |  |
| 4   | 411 E. Bonneville, Ste. 250<br>Las Vegas, Nevada 89101                                       |   |  |
| 5   | (702) 388-6577/Phone<br>(702) 388-6261/Fax   |   |  |
| 6   | Raquel_Lazo@fd.org   |   |  |
| 7   | Attorney for Dioselis Ann Fuentes-Nodarse  |   |  |
| 8   | UNITED STATES DISTRICT COURT   |   |  |
| 9   | DISTRICT OF NEVADA   |   |  |
| 10  |  |   |  |
| 11  | UNITED STATES OF AMERICA,  | Case No. 2:16-cr-303-APG-NJK              |  |
| 12  | Plaintiff,   | STIPULATION TO CONTINUE                   |  |
| 13  | v.   | <u>REVOCATION HEARING</u> (First Request) |  |
| 14  | DIOSELIS ANN FUENTES-NODARSE,  |   |  |
| 15  | Defendant.   |   |  |
| 16  |  |   |  |
| 17  | IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden                          |   |  |
| 18  | United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the |   |  |
| 19  | United Stated of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo   |   |  |
| 20  | Assistant Federal Public Defender, counsel for Dioselis Ann Fuentes-Nodarse, that the        |   |  |
| 21  | Revocation Hearing currently scheduled on February 16, 2017 at 10:30 a.m., be vacated and    |   |  |
| 22  | continued to a date and time convenient to the Court, but no later than March 6, 2017.       |   |  |
| 23  | This Stipulation is entered into for the following reasons:                                  |   |  |
| 24  | 1. Defense counsel will not be able to visit Mr. Fuentes until February 16, 2017             |   |  |
| 25  | the date on which the hearing is currently scheduled. The time requested is necessary to mee |   |  |
| 26  | with Mr. Fuentes and review the violations he is alleged to have violated.                   |   |  |

## Case 2:16-cr-00303-APG-NJK Document 15 Filed 02/08/17 Page 2 of 3

| 1  | 2. Government counsel will be out of the district from March 6th - 13th                      | th. |  |
|----|--|-----|--|
| 2  | Accordingly, the parties ask that the hearing be set at a time prior to March 6th.           |     |  |
| 3  | 3. The defendant is in custody and agrees with the need for the continuance.                 |     |  |
| 4  | 4. The parties agree to the continuance.   |     |  |
| 5  | This is the first request for a continuance of the revocation hearing.                       |     |  |
| 6  | DATED this 7 <sup>th</sup> day of February, 2017.  |     |  |
| 7  |  |     |  |
| 8  | RENE L. VALLADARES Federal Public Defender  DANIEL G. BOGDEN United States Attorney          |     |  |
| 10 | /s/ Raquel Lazo /s/ Susan Cushman By By  |     |  |
| 11 | RAQUEL LAZO Assistant Federal Public Defender SUSAN CUSHMAN Assistant United States Attorney |     |  |
| 12 | Assistant rederal rubile Defender Assistant Office States Attorney                           |     |  |
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## UNITED STATES DISTRICT COURT

| 2        | DISTRICT OF NEVADA                       |  |  |
|----------|--|--|--|
| 3        | UNITED STATES OF AMERICA,                | Case No. 2:16-cr-303-APG-NJK             |  |
| 5        | Plaintiff,                               | <u>ORDER</u>                             |  |
| 6        | v. DIOSELIS ANN FUENTES-NODARSE,         |  |  |
| 7        | Defendant.                               |  |  |
| 8 9      |  |  |  |
| 10       | IT IS THEREFORE ORDERED that the re      | vocation hearing currently scheduled for |  |
| 11       | Thursday, February 16, 2017 at 10:30     | a.m., be vacated and continued to        |  |
| 12       | February 23, 2017 at the hour of 1:3     | 0 p.m.; or to a time and date convenien  |  |
| 13       | to the court in Courtroom 6C.            |  |  |
| 14       | DATED this <u>8th</u> of February, 2017. |  |  |
| 15<br>16 |  | al                                       |  |
| 17       | UNI                                      | TED STATES DISTRICT JUDGE                |  |
| 18       |  |  |  |
| 19       |  |  |  |
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| 21   22  |  |  |  |
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